

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

.....X
GUATEGUARD, INC.,

Plaintiff,

Civil Case No.: 1:20-CV-01609
(VEC)(GWG)

-against-

GOLDMONT REALTY CORP.,
LEON GOLDENBERG,
ABI GOLDENBERG,

**NOTICE OF MOTION TO
DISQUALIFY SIMCHA
SCHONFELD AND KOSS &
SCHONFELD, LLP**

Defendants.

.....X

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law in Support of Plaintiff GateGuard, Inc.'s Motion to Disqualify Simcha D. Schonfeld and Koss & Schonfeld, LLP, and the Declaration of Eden P. Quainton, dated September 1, 2022, and the exhibits thereto, Plaintiff will move this Court, before the Honorable Gabriel W. Gorenstein, in the United States Courthouse, Southern District of New York, 40 Foley Square, Courtroom 906, New York, New York 10007, on such day when counsel may be heard, for an Order disqualifying Simcha D. Schonfeld and the firm of Koss & Schonfeld, LLP from further representation of Defendants Goldmont Realty Corp., Leon Goldenberg and Abi Goldenberg in the above-captioned matter, and granting such other and further relief as the Court deems just and proper.

Dated: New York, New York
September 1, 2022

Eden Quainton

Eden P. Quainton
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GateGuard, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that on September 1, 2022, the foregoing document was filed through the CM/ECF system and thereby served electronically on counsel for Goldmont Realty Corp., Leon Goldenberg and Abi Goldenberg.

Dated: September 1, 2022

/s/ Eden P. Quainton

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